Case:17-03283-LTS Doc#:20093 Filed:02/10/22 Entered:02/10/22 13:28:36 Desc: Main Document Page 1 of 12

## Document Page 1 of 12 UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.

Debtors.<sup>1</sup>

**PROMESA** 

Title III

Case No. 17 BK 3283-LTS (Jointly Administered)

## **MOTION FOR VOLUNTARY DISMISSAL**

**PLEASE TAKE NOTICE THAT** Asociación Puertoriqueña de la Judicatura, Inc. ("APJ"), through its undersigned counsel, pursuant to FRAP RULE 42(a), hereby respectfully submits its Motion for Voluntary Dismissal (the "Motion"), and in support states:

- 1. On February 4, 2022, APJ filed its Notice of Appeal (the "Appeal") of the Findings of Fact and Conclusions of Law in Connection with Confirmation of the Modified Eighth Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority [Docket No. 19812], and of the Order and Judgment Confirming Modified Eighth Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority [Docket No. 19813]. The Appeal has not been docketed
  - 2. APJ wishes to voluntarily withdraw the Appeal.
- 3. No parties will be prejudiced by the Motion. All parties will be given notice of the Motion.

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("<u>COFINA</u>") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS)

Case:17-03283-LTS Doc#:20093 Filed:02/10/22 Entered:02/10/22 13:28:36 Desc: Main

(Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.)

The parties, and the names and addresses of their respective attorneys, are as follows:

O'NEILL & BORGES LLC
By: Hermann D. Bauer

250 Muñoz Rivera Avenue, Suite 800San

Juan, PR 00918-1813

OF COUNSEL FOR A&S LEGAL STUDIO, PSC By: Luis F. del Valle-Emmanuelli

434 Avenida Hostos San Juan, PR 00918

PROSKAUER ROSE LLP By: Martin J. Bienenstock

Brian S. Rosen Jeffrey W. Levitan Ehud Barak

Timothy W. Mungovan Joshua A. Esses

Eleven Times Square New York, NY

10036

Attorneys for the Financial Oversight and Management Board for Puerto Rico, as representative of the Commonwealth of Puerto Rico

MARINI PIETRANTONI MUÑIZ LLC

By: Luis C. Marini-Biaggi Carolina Velaz-Rivero MCS Plaza, Suite 500 255 Ponce de León Ave. San Juan, Puerto Rico 00917

O'MELVENY & MYERS LLP

By: John J. Rapisardi Maria J. DiConza Matthew P. Kremer 7 Times Square New York, New York 10036 SALDAÑA, CARVAJAL, & VÉLEZ-RIVÉ, P.S.C.

By: José A. Sánchez Girona 166 Avenida de la Constitución San Juan, Puerto Rico 00901

DAVID CARRION BARALT By: David Carrion Baralt

P.O. Box 364463

San Juan, PR 00936-4463

RUSSELL A. DEL TORO SOSA By: Russell A. Del Toro Sosa Cond. Condado Princess #2 Calle Washington 304 San Juan, Puerto Rico 00907

JOSE ÁNGEL REY

By: Jose Ángel Rey P.O. Box 10127

San Juan, PR 00908-1127

Attorneys for PFZ Properties, Inc.

PETER C. HEIN By: Peter C. Hein

101 Central Park W # 14E New York, NY 10023-4250

Pro Se

CHARLES A. CUPRILL, P.S.C. LAW OFFICES

By: Charles A. Cuprill-Hernández 356 Fortaleza Street, Second Floor

San Juan, PR 00901

Counsel for Sucesión Pastor Mandry Mercado

Peter Friedman 1625 Eye Street, NW Washington, DC 20006

Attorneys for Hon. Pedro R. Pierluisi and the Puerto Rico Fiscal Agency and Financial Advisory Authority

CASILLAS, SANTIAGO & TORRES LLC

By: Juan J. Casillas Avala Israel Fernández Rodríguez Juan C. Nieves González Cristina B. Fernández Niggemann PO Box 195075 San Juan, Puerto Rico 00919-5075

PAUL HASTINGS LLP

By: Luc A. Despins G. Alexander Bongartz 200 Park Avenue New York, New York 10166

Counsel to the Official Committee of Unsecured Creditors

BENNAZAR, GARCÍA & MILIÁN, C.S.P.

By: A.J. Bennazar-Zequeira Héctor M. Mavol Kauffmann Francisco del Castillo Orozco Edificio Union Plaza, 1701 Avenida Ponce de León #416 Hato Rey, San Juan Puerto Rico 00918

JENNER & BLOCK LLP

By: Robert Gordon Richard Levin 919 Third Ave

New York, NY 10022-3908

Catherine Steege Melissa Root Landon Raiford 353 N. Clark Street Chicago, IL 60654

Counsel for The Official Committee of Retired Employees of Puerto Rico

GODREAU & GONZALEZ LAW, LLC By: Rafael A. Gonzalez Valiente

PO Box 9024176 San Juan, PR 00902-4176

Counsel for Suiza Dairy

ISABEL FULLANA-FRATICELLI & ASSOCS.,

P.S.C.

By: Isabel M. Fullana Eduardo J. Capdevila The Hato Rey Center Bldg. 268 Ave. Ponce de León Ste. 1002 San Juan, Puerto Rico 00918

Counsel to Finca Matilde. Inc

RIVERA, TULLA AND FERRER, LLC

By: Eric A. Tulla

Rivera Tulla & Ferrer Building50

Quisqueya Street

San Juan, PR 00917-1212

HOGAN LOVELLS US LLP

By: Robin E. KellerRonald J. SilvermanPieter Van Tol 390 Madison Avenue New York, NY 10017

Counsel to the Trustee

MONSERRATE SIMONET & GIERBOLINI

By: Miguel Simonet Sierra 101 San Patricio Ave., Suite 1120

Guaynabo, PR 00968

COHEN, WEISS AND SIMON LLP

By: Peter D. DeChiara Richard M. Seltzer Marie B. Hahn 900 Third Avenue, Suite 2100

New York, NY 10022-4869

Counsel to Service Employees International Union

SALDAÑA, CARVAJAL, & VÉLEZ-RIVÉ, P.S.C.

By: José A. Sánchez Girona 166 Avenida de la Constitución San Juan, Puerto Rico 00901

Counsel for Mapfre PRAICO Insurance Company

ALMEIDA AND DAVILA By: Enrique M. AlmeidaPO Box 191757 San Juan, PR 00919-1757

Attorneys for Credit Unions

DELGADO & FERNÁNDEZ, LLC By: Alfredo Fernández-Martínez PO Box 11750 Fernández Juncos Station San Juan, Puerto Rico 00910-1750

JONES DAY
By: Bruce Bennett
555 South Flower Street
Fiftieth Floor
Los Angeles, CA 90071
Benjamin Rosenblum
250 Vesey Street
New York, New York 10281
Matthew E. Papez
51 Louisiana Ave. N.W.
Washington, DC 20001

Counsel for Andalusian Global Designated Activity Company, Crown Managed Accounts for and on behalf of Crown/PW SP, LMA SPC for and on behalf of Map 98 Segregated Portfolio, Mason Capital Master Fund LP, Oaktree-Forrest Multi-Strategy, LLC (Series B), Oaktree Opportunities Fund IX, L.P., Oaktree Opportunities Fund IX (Parallel), L.P., Oaktree Opportunities Fund IX (Parallel 2), L.P., Oaktree Huntington Investment Fund II, L.P., Oaktree Opportunities Fund X, L.P., Oaktree Opportunities Fund X (Parallel), L.P., Oaktree *Opportunities Fund X (Parallel 2), L.P.,* Oaktree Value Opportunities Fund Holdings, L.P., Oceana Master Fund Ltd., Ocher Rose, L.L.C., Pentwater Merger Arbitrage Master Fund Ltd., PWCM Master Fund Ltd., and Redwood Master Fund, Ltd.

ADSUAR MUÑIZ GOYCO SEDA &PEREZ-OCHOA PSC By: Eric Pérez-Ochoa Luis A. Oliver-Fraticelli PO Box 70294 San Juan, PR 00936

WEIL, GOTSHAL &MANGES LLP By: Jonathan D. Polkes Gregory Silbert Robert S. Berezin Kelly DiBlasi Gabriel A. Morgan 767 Fifth Avenue New York, NY 10153

Attorneys for National Public Finance Guarantee Corp.

## CASELLAS ALCOVER & BURGOS P.S.C.

By: Heriberto Burgos Pérez Ricardo F. Casellas-Sánchez Diana Pérez-Seda P.O. Box 364924 San Juan, PR 00936-4924

## CADWALADER, WICKERSHAM & TAFT LLP

By: Howard R. Hawkins, Jr.
Mark C. Ellenberg
William J. Natbony
Thomas J. Curtin
Casey J. Servais
200 Liberty Street
New York, New York 10281

Counsel for Assured Guaranty Corp. and Assured Guaranty Municipal Corp.

REXACH & PICÓ, CSP By: María E. Picó 802 Ave. Fernández Juncos

San Juan, PR 00907-4315

BUTLER SNOW LLP

By: Martin A. Sosland 2911 Turtle Creek Blvd., Suite 1400

Dallas, TX 75219
James E. Bailey III
Adam M. Langley 6075
Poplar Ave., Suite 500
Memphis, TN 38119

Counsel for Financial Guaranty Insurance Company

CÓRDOVA & DICK, LLC By: Brian M. Dick Biascoechea #403 Calle 12 de Octubre Urb. El Vedado San Juan, PR 00918

Local Counsel to the Ad Hoc Group of FGIC Noteholders

SHEPPARD MULLIN RICHTER & HAMPTON LLP

By: Lawrence A. Larose 30 Rockefeller Plaza New York, New York 10112

Counsel to the Ad Hoc Group of FGIC Noteholders

MCCONNELL VALDÉS LLC

By: Arturo J. García-Solá Nayuan Zouairabani 270 Muñoz Rivera Avenue, Suite 7 Hato Rey, Puerto Rico 00918 P.O. Box 364225San Juan, PR 00936-4225

Attorneys for AmeriNational Community Services, LLC, as Servicer for the GDB Debt Recovery Authority

BOBONIS, BOBONIS & RODRIGUEZ POVENTUD

By: Enrique G. Figueroa-Llinás 129 de Diego Ave. San Juan, Puerto Rico 00911-1927 ANTONETTI MONTALVO & RAMIREZ COLL

By: José L. Ramírez-Coll Carolina V. Cabrera Bou P.O. Box 13128 San Juan, PR 00908

Counsel for J.P. Morgan Securities LLC

McCONNELL VALDÉS LLC By: Roberto C. Quiñones-Rivera 270 Muñoz Rivera Avenue Hato Rey, Puerto Rico 00918

Counsel for Samuel A. Ramirez & Co., Inc., Barclays Capital Inc., RBC Capital Markets, LLC and Raymond James & Associates, Inc.

MORELL, CARTAGENA & DAPENA LLC

By: Ramón E. Dapena Iván Lladó PO Box 13399 San Juan, Puerto Rico 00908

Counsel for Goldman Sachs & Co. LLC and Citigroup Global Markets Inc.

COTO & ASSOCIATES By: Ramón Coto-Ojeda MCS Plaza, Suite 800 255 Ponce de León Avenue San Juan, Puerto Rico 00917

Counsel to Mesirow Financial, Inc.

SARLAW LLC

By: Sergio A. Ramírez de Arellano Banco Popular Center, Suite 1022 209 Muñoz Rivera Ave. San Juan, PR 00918-1009 Counsel for Merrill Lynch, Pierce, Fenner & Smith Inc. and Merrill Lynch Capital Services, Inc.

Counsel for Sidley Austin LLP

FRIEDMAN KAPLAN SEILER & ADELMAN

LLP

By: Eric Seiler Anne E. Beaumont Danielle E. Tepper 7 Times Square New York, NY 10036

Counsel for Sidley Austin LLP

SCHULTE ROTH & ZABEL LLP

By: Douglas S. Mintz

901 Fifteenth Street, NW, Suite 800

Washington, DC 20005

Douglas Koff Adam C. Harris Taleah Jennings Abbey Walsh Peter J. Amend 919 Third Avenue New York, NY 10022

Attorneys for Cantor-Katz Collateral Monitor LLC, as Collateral Monitor for the GDB Debt Recovery Authority

SALDAÑA, CARVAJAL & VÉLEZ-RIVÉ, P.S.C.

By: Luis N. Saldaña-Román Ángel E. Rotger-Sabat

166 Avenida de la Constitución San Juan, Puerto Rico 00901

Counsel for Morgan Stanley & Co. LLC

NELSON ROBLES-DIAZ LAW OFFICES, P.S.C.

By: Nelson Robles-Díaz

P. O. Box 192302

San Juan, Puerto Rico 00919-2302

Counsel for Santander Securities LLC

C. CONDE & ASSOC. LAW OFFICES

By: Carmen D. Conde Torres

Luisa S. Valle Castro 254 San José Street Suite 5 San Juan, PR 00901-1523

Counsel for Santander Securities LLC

FERRAIUOLI LLC

By: Roberto Cámara-Fuertes

Sonia Colón

221 Ponce de León Avenue, 5th Floor

San Juan, PR 00917

MILBANK LLP

By: Dennis F. Dunne

Atara Miller

Grant R. Mainland

John J. Hughes, III

Jonathan Ohring

55 Hudson Yards

New York, NY 10001

Attorneys for Ambac Assurance Corporation

G. CARLO-ALTIERI LAW OFFICES,

LLC

By: Gerardo A. Carlo-Altieri

254 Calle San José

Third Floor

San Juan, PR 00901

EPSTEIN BECKER & GREEN, P.C.

By: Wendy G. Marcari 875 Third Avenue

New York, NY 10022

Attorneys for Vaquería Tres Monjitas, Inc.

GOODWIN PROCTER LLP

By: Douglas H. Flaum Charles A. Brown Howard S. Steel Stacy A. Dasaro

The New York Times Building 620 Eighth

New York, NY 10018

Counsel for Goldman Sachs & Co. LLC Counsel for Citigroup Global Markets Inc.

G. CARLO-ALTIERI LAW OFFICES,

LLC

By: Gerardo A. Carlo-Altieri

254 Calle San José Third Floor

San Juan, PR 00901

MORRISON & FOERSTER LLP

By: James M. Peck Gary S. Lee James A. Newton Andrew R. Kissner 250 West 55th Street

New York, New York 10019

Counsel for the Ad Hoc Group of Constitutional

Debtholders

U.S. DEPARTMENT OF JUSTICE

By: David A. Hubbert Ward W. Benson Post Office Box 227 Washington, DC 20044

The United States of America,

on behalf of the Internal Revenue Service

**NAVARRO-CABRER LAW OFFICES** 

By: Nilda M. Navarro-Cabrer

El Centro I, Suite 206 500 Muñoz Rivera Ave. San Juan, Puerto Rico 00918

Counsel to BMO Capital Markets GKST, Inc.

SIMPSON THACHER & BARTLETT LLP

By: John K. Youngwood

David Elbaum

425 Lexington Avenue New York, NY 10017

Counsel to J.P. Morgan Securities LLC

**REICHARD & ESCALERA** 

By: Rafael Escalera Sylvia M. Arizmendi Carlos R. Rivera-Ortiz 255 Ponce de León Avenue MCS Plaza, 10th Floor

San Juan, Puerto Rico 00917-1913

QUINN EMANUEL URQUHART & SULLIVAN,

By: Susheel Kirpalani

**Daniel Salinas** Eric Kay Zachary Russell

51 Madison Avenue, 22nd Floor New York, New York 10010-1603

Co-Counsel for the Lawful Constitutional

Debt Coalition

CORREA-ACEVEDO & ABESADA LAW

OFFICES, PSC By: Sergio Criado Roberto Abesada-Agüet

Centro Internacional de Mercadeo, Torre II # 90 Carr. 165, Suite 407 Guaynabo, PR 00968

MORGAN, LEWIS & BOCKIUS LLP

By: Kurt A. Mayr David L. Lawton David K. Shim One State Street

Hartford, CT 06103-3178

Co-Counsel for the QTCB Noteholder Group

SEPULVADO, MALDONADO & COURET

By: Albéniz Couret-Fuentes

304 Ponce de León Ave. - Suite 990

San Juan, PR 00918

REED SMITH LLP

By: Luke Sizemore Jared S. Roach

225 Fifth Avenue, Suite 1200

Pittsburgh, PA 15222

Counsel to The Bank of New York Mellon

CROWELL & MORING LLP

By: Daniel L. Zelenko Sarah M. Gilbert

590 Madison Avenue, 20th Floor

New York, NY 10022

Counsel for Santander Securities LLC

McGUIREWOODS LLP

By: E. Andrew Southerling 2001 K Street N.W., Suite 400 Washington, DC 20006-1040

Aaron G. McCollough

77 West Wacker Drive, Suite 4100

Chicago, IL 60601-1818

Counsel for BMO Capital Markets GKST, Inc.

KAYSER & REDFERN, LLP

By: Leo Kayser III 515 Madison Avenue New York, NY 10022

Counsel for Samuel A. Ramirez & Co., Inc.

CHAPMAN AND CUTLER LLP

By: James M. Heiser 111 West Monroe Street Chicago, IL 60603-4080

Counsel to Mesirow Financial, Inc.

SKADDEN, ARPS, SLATE, MEAGHER & FLOM

LLP

By: Julie E. Cohen Four Times Square New York, NY 10018

Counsel for Morgan Stanley & Co. LLC

ANTONETTI MONTALVO & RAMIREZ COLL

By: José L. Ramírez-Coll Carolina V. Cabrera Bou

P.O. Box 13128 San Juan, PR 00908

Counsel to University of Puerto Rico Retirement

System Trust

JIMÉNEZ, GRAFFAM & LAUSELL

By: J. Ramón Rivera Morales Andrés F. Picó Ramírez P.O. Box 366104 San Juan, PR 00936

WILLKIE FARR & GALLAGHER LLP

By: Mark T. Stancil 1875 K Street, N.W. Washington, DC 20006

PAUL, WEISS, RIFKIND, WHARTON &

**GARRISON LLP** 

By: Andrew N. Rosenberg

Karen R. Zeituni

1285 Avenue of the Americas

New York, NY 10019

ROBBINS, RUSSELL, ENGLERT, ORSECK,

UNTEREINER & SAUBER LLP

By: Lawrence S. Robbins

Gary A. Orseck Donald Burke

2000 K Street, N.W., 4th Floor

Washington, DC 20006

Co-Counsel for the Ad Hoc Group of General

Obligation Bondholders

BUFETE FERNÁNDEZ & ALCARAZ CSP

By: Ignacio Fernández De Lahongrais Capital Center Sur, Suite 202 Avenida Arterial Hostos #239 San Juan, PR 00918-1475

BUFETE DÍAZ-FERRER

By: Marvin Díaz Ferrer Cond. Vick Center Ste. C-202 867 Ave. Muñoz Rivera San Juan, PR 00925

Counsel for Miriam E. Lima Colón, Betzaida Feliciano Concepción and Angel L. Méndez

González

ALBERTO RIVERA RAMOS By: Alberto Rivera Ramos 3001 Ave. Isla Verde Plaza del Mar, Apt. 305 Carolina, PR 00979

Attornes for Community Health Foundation of P.R.

CHARLES A. CUPRILL, P.S.C. LAW OFFICES

By: Charles A. Cuprill Hernández 356 Fortaleza Street, Second Floor

San Juan, PR 00901

Counsel for Med Centro, Inc., formerly Consejo de Salud de la Comunidad de la Playa de

Ponce. Inc.

CARLOS FERNANDEZ-NADAL

By: Carlos Fernandez-Nadal 818 Hostos Ave. Ste. B Ponce, PR 00716

Counsel for Jorge Rafael Eduardo Collazo Quinones

CARLOS A. QUILICHINI PAZ By: Carlos A. Quilichini Paz Jessica M. Quilichini Ortiz

Post Office Box 9020895 San Juan, PR 00902

Attorneys for Cooperativa de Ahorro y Crédito Vegabajeña ORRICK, HERRINGTON & SUTCLIFFE LLP

By: Robert Stern Tiffany Row Columbia Center 1152 15th Street, N.W. Washington, DC 20005-1706

Counsel for RBC Capital Markets, LLC

PRESTIGE LEGAL SERVICES, LLC

By: José Luis Barrios-Ramos 278 Ave. César González San Juan, Puerto Rico 00918

Counsel to Asociacion de Maestros de Puerto Rico and Asociacion de Maestros de Puerto Rico -Local

Sindical

MERCEDES FIGUEROA Y MORGADE

By: Mercedes Figueroa y Morgade

3415 Alejandrino Ave.,

Apt. 703,

Guaynabo, PR 00969-4856

Counsel for Amador

FUENTES LAW OFFICES, LLC By: Alexis Fuentes-Hernández

P.O. Box 9022726

San Juan, PR 00902-2726

Counsel for Maruz Real Estate Corp

IVONNE GONZALEZ-MORALES

By: Ivonne Gonzalez-Morales PO BOX 9021828

San Juan, PR 00902-1828

Counsel for Group Wage Creditors

DLA PIPER (PUERTO RICO) LLC By: Mariana Muñiz Lara Calle de la Tanca #500, Suite 401

San Juan, PR 00901-1969

Counsel to Quest Diagnostics of Puerto Rico, Inc.

FUENTES LAW OFFICES, LLC By: Alexis Fuentes-Hernández P.O. Box 9022726 San Juan, PR 00902-2726

Counsel for Lortu-Ta LTD, Inc.; La
Cuarterola, Inc.; Juaza, Inc.; and The
Conjugal Partnership Composed of
Juan Zalduondo Viera And Magdalena
Machicote Ramery
Counsel for Sucn. De Frank Torres Ortiz &
Aurea Rodriguez Composed by Frank E. Torres
Rodriguez & Eva Torres Rodríguez

ANTONIO MARTIN CERVERA

By: Antonio Martin Cervera H-22 Yagrumo, Caparra Hills Guaynabo, PR 00968 Pro Se

WANDA I. ORTIZ SANTIAGO By: Wanda I. Ortiz Santiago Urb. Las Leandras JJ-5 Calle 21 Humacao, PR 00791 Pro Se

YASHEI ROSARIO By: Yashei Rosario HC 2 Box 12914 Vieques, PR 00765 Pro Se

EDGARDO MÁRQUEZ LIZARDI By: Edgardo Márquez Lizardi Cond. El Monte Sur 190 Ave. Hostos Apt. 9399 San Juan, PR 00918 Pro Se MENDOZA LAW OFFICES By: Enrique J. Mendoza Méndez P.O. Box 9282 San Juan, PR 00908-0282

Counsel to Asociación de Jubilados de la Judicatura de Puerto Rico

MARIA TERESITA MARTIN By: Maria Teresita Martin H-22 Yagrumo, Caparra Hills Guaynabo, PR 00968 Pro Se

NANCY I. NEGRON-LÓPEZ By: Nancy I. Negron-López HC 3 Box 34941 San Sebastián, PR 00685 Pro Se

ANA A. NUÑEZ VELÁQUEZ By: Ana A. Nuñez Veláquez 19 Res. Veillanueva Apto 170 Aguadilla, PR 00603 Pro Se

MIGUEL LUNA DE JESUS By: Miguel Luna De Jesus Villa Del Monte 1 Calle Monte Alto Toa Alta, PR 00953 Pro Se ISMAEL L. PURCELL SOLER

By: Ismael L. Purcell Urb. Jacaranda 35271 Calle Clavelina Ponce, PR 00730 Pro Se

JAVIER ALEJANDRINO OSORIO

By: Javier Alejandrino Osorio

PO Box 1259

Saint Just, PR 00978

Pro Se

ARTHUR SAMODOVITZ

By: Arthur Samodovitz 140 Lasa Dr. Apt 204, St. Augustine, FL 32084

Pro Se

Respectfully submitted,

Dated: February 10, 2022

By: Mildred Batista De Leon PO Box 1259 Saint Just, PR 00978 Pro Se

MILDRED BATISTA DE LEON

NILSA CANDELARIO

By: Nilsa Candelario

405 Ave. Esmeralda Ste. 2-559

Guaynabo, PR 00969

Pro Se

WE HEREBY CERTIFY that on this same date we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all participants and Standard Parties. Notice to Pro Se parties was delivered through mail to their respective mailing addresses on record. A courtesy copy of this Motion will be delivered to the Court by email to SwainDPRCorresp@nysd.uscourts.gov as provided in First Amended Standing Order.

INDIANO & WILLIAMS, P.S.C.

207 del Parque Street; 3rd Floor San Juan, P.R. 00912 Tel: (787) 641-4545; Fax: (787) 641-4544 david.indiano@indianowilliams.com jeffrey.williams@indianowilliams.com

by: /s/ David C. Indiano DAVID C. INDIANO USDC-PR NO. 200601